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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 155
Seattle, WA 98101-3188

AIR & RADIATION DIVISION

FEB , 4 2020

Mr. Steve Henson, Plant Manager
PotlatchDeltic Land and Lumber, LLC
St. Maries Complex
2200 Railroad Avenue
St. Maries, Idaho 83861

Dear Steve:

Through this letter I wish to accomplish two goals, the first being to respond to your letter to us dated December 23, 2019, and the second being to invite you to discuss options for addressing the issues PotlatchDeltic has raised with the minor new source review (NSR) and prevention of significant deterioration (PSD) permits originally issued June 21, 2019.

We undertook a detailed review of your request against applicable regulations, as well as the permit deviation reporting requirements that will be required in PotlatchDeltic's title V permit based on 40 CFR part 71. Based on that review and currently available information, we do not believe there is a basis for deleting the specified permit conditions, as PotlatchDeltic has requested (see enclosure for specified conditions). However, based on the information submitted to date, EPA is prepared to propose to revise those minor NSR and PSD permit conditions to clarify that the ten-day written notification requirement does not apply to deviations reported under permit conditions 5.4.2.2 and 5.2.2.2 but applies only to deviations reported under 5.4.2.1 and 5.2.2.1. This latter category of deviations includes exceedances (greater than two hours in duration) of the kiln temperature limit in minor NSR and PSD permit conditions 3.2 and 3.3, respectively.

As to the second goal, it is my understanding that PotlatchDeltic is preparing an application to request revisions of other aspects of both the minor NSR and PSD permits. Prior to submitting this application, I invite you to either call me or preferably visit our offices with your team to establish a new working relationship where we can discuss the goals and expectations of the permitting project, and efficient use of our collective resources towards developing a complete application. We are open to working with you to develop a complete application that will enable us to develop permits that meet the requirements of the Clean Air Act and with which you are able to comply.

If you have any questions regarding this letter, please contact Dan Meyer, permit writer, at (206) 553-4150 or meyer.dan@epa.gov or Kelly McFadden, Branch Manager, at (206)-553-1679 or mcfadden.kelly@epa.gov.

Sincerely,

Krishna Viswanathan
Director

Enclosure
cc: Mr. Les Higgins
Air Quality Manager, Coeur d'Alene Tribe

Technical Enclosure

In your December 23, 2019 letter you requested revisions to the following:

1. Minor NSR and PSD permit conditions 5.4 and 5.2, respectively, by deleting the requirement that a written notice be submitted within ten working days of the occurrence of a deviation.
2. The requirements in minor NSR and PSD permit conditions 5.4.2.1 and 5.2.2.1, respectively, to report within 48 hours emissions of any regulated air pollutant that continue for more than two hours in excess of permit requirements.

Applicable Administrative Issues:
Permit conditions 5.4.2.1 and 5.2.2.1 in your minor NSR and PSD permits are identical to the deviation reporting requirements in 40 CFR part 71, specifically 71.6(a)(3)(iii)(B). As such, these conditions are required to be in PotlatchDeltic's part 71 operating permit. These permit conditions were included to assure compliance with the minor NSR and PSD permits and ease the transferability of these permit conditions to the part 71 operating permit when it is issued.

Similarly, the ten-day written notification requirements in minor NSR and PSD permit conditions 5.4 and 5.2, respectively are consistent with the deviation reporting requirement in part 71 and will be in your part 71 permit. Therefore, these conditions were also included for similar reasons, as stated above.

Technical Issues:
According to the identical permit conditions found in 5.4.2.1 and 5.2.2.1, the highest 60-minute average dry bulb temperature of heated air exiting each load of lumber in each zone of Lumber Dry Kiln No. 6 shall not exceed 245°F. This work practice standard is a critical element of EPA's minor NSR control technology review determination for minimizing PM_{10} and $PM_{2.5}$ emissions as well as a critical element of EPA's PSD best available control technology determination for minimizing VOC emissions. Compliance with the zone-specific temperature limit confirms that PotlatchDeltic has installed and is operating and maintaining a computerized kiln management system to control the drying process, zone-by-zone. Information in the administrative record for both the minor NSR and PSD permitting actions illustrate that the higher a charge's maximum drying temperature, the greater the charge's VOC emissions. See Appendix E of the Fact Sheet supporting the June 21, 2019 PSD permit. As we stated in the Permit Analysis supporting the June 21, 2019 minor NSR permit:

> *PM10 and PM2.5 emissions are defined as the sum of condensible particulate matter (CPM) plus filterable PM10 and PM2.5, respectively.[7] Reducing VOC emissions will effectively reduce PM10 and PM2.5 because CPM is primarily made up of semi-volatiles which are emitted from wood via the same mechanism as VOC.[8] As a result, the work practices found in the PSD permit for this project and other Northwest agency permits will help reduce PM10 and PM2.5 emissions.*

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[7] *As defined in 40 CFR 51.50, condensible particulate matter is material that is vapor phase at stack conditions, but which condenses and/or reacts upon cooling and dilution in the ambient air to form solid or liquid PM immediately after discharge from the stack. Note that all condensible particulate matter, if present from a source, is typically in the PM2.5 size fraction and, therefore, all of it is a component of both primary PM2.5 and primary PM10.*

[8] *Most volatile organic compounds (quantified via RM25A) will not be double-counted as CPM (quantified through RM202). In other words, VOC and semi-volatile organics can be considered separate pollutants.*

To summarize, the permit conditions require an oral report (by telephone) within 48 hours of the occurrence of a deviation associated with the generation of regulated air pollutant emissions in excess of permit requirements for a duration greater than two hours (see minor NSR and PSD permit conditions 5.4.2.1 and 5.2.2.1, respectively). A written notice must be submitted within ten working days of the occurrence of such a deviation (see minor NSR and PSD permit conditions 5.4 and 5.2, respectively). Revising minor NSR and PSD permit conditions 5.4 and 5.4.2.1 along with 5.2 and 5.2.2.1, respectively, as you propose to make them less stringent would result in reporting requirements less stringent than the default deviation reporting requirement in part 71 and would not support control technology review or best available technology review determinations on which the current permits are based.